



King County Board of Ethics
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Date: April 17, 2006

To: King County Executive
Members of the Metropolitan King County Council
Separately Elected Officials
Ombudsman—Director of the Office of Citizen Complaints
Department Directors of King County
King County Board of Ethics Members

From: Catherine A. Clemens, Executive Director
King County Board of Ethics

Re: **Final Report on the 2006 Program for the
Disclosure of Financial and Other Interests**

Summary

The King County Board of Ethics is authorized under K.C.C. 3.04.050 to conduct an annual program that requires elected officials, affected county employees, and affected board and commission members to file statements of financial and other interests. The purpose of this program is to ensure the public's trust in government by disclosing any conflicts between our personal and financial interests and our service to King County residents. Because the April 15th filing deadline coincided with a Saturday, we accepted completed statements received in the ethics office by 9:00 a.m., Monday, April 17th.

Compliance at 9:00 a.m. on April 17, 2006

Employees and Elected Officials

Total number of employees required to file:	2,432
Percentage in compliance:	99.8%
Number of employees not filed:	6

Board and Commission Members

Total number of members required to file:	432
Percentage in compliance:	98.4%
Number of members not filed:	7

Overall Compliance

Total number of individuals required to file:	2,864
Percentage in compliance:	99.5%
Number of individuals not filed:	13

THE FOLLOWING REPORT provides details of the 2006 disclosure program, including information on training and education; systems of document review; notifications, reminders and reports; and recommendations for improvements to the program.

The Program

Chapter 3.04 of the King County Code requires annual disclosure of financial and other interests by April 15th. The intent is to educate employees and identify situations in which there may be a potential for conflict between the exercise of official responsibilities on behalf of King County and private interests. County law requires annual financial disclosure by elected county officials; employees appointed by the county executive; and employees appointed by the county administrative officer or department directors and who are subject to the approval of the county executive. In addition, under K.C.C. 3.04.050, the Board of Ethics has determined other categories of employees who are required to file, including but not limited to, certain members of boards, commissions, committees and other multi-member bodies; employees whose duties include grant and contract management authority; and those who invest, manage or authorize the expenditure of county funds.

Training and Education

In order to encourage greater understanding of the program and increase compliance with its requirements, the executive director offered orientations for department coordinators and staff liaisons assigned to boards and commissions. Participants received an overview of the program, a timeline of important dates, a list of categories identifying who must file, a roster from the previous year for their department or board, and a sample form. The ethics office also included a list of ideas to increase timely compliance and an information sheet entitled "The ABC's of Financial Disclosure," appropriate for copying and distribution to affected filers. In addition, all coordinators and staff liaisons received these helpful materials via email on January 11th. Finally, the ethics office posted current 'fillable' forms on the ethics web site by December 1, 2005, making them easier to access and to complete.

Notifications, Reminders and Reports

On December 22, 2005, the executive director communicated directly with department leaders to request names of designated staff responsible for coordinating employee and board and commission filing. Beginning in early January and continuing through April 13th, ethics staff provided timely notices, reminders, and comprehensive reports on compliance to those employees designated by department directors to implement the program. Between February 13th and April 11th, coordinators and staff liaisons received weekly status reports. On March 27th, three weeks from the filing deadline, the executive director reported progress to the executive, County Council chair, separately elected officials, and department directors and their deputies. Reports included an overview of filing compliance for all departments and the boards and commissions within those departments.

Review and Audit Process

To ensure consistency and accuracy, the executive director reviewed and audited all forms systematically. Upon receipt, ethics staff date-and-time-stamped all forms. Following individual review, incomplete forms, or forms requiring clarifying information, were either immediately returned directly to the individual together with an explanatory note or resolved through email inquiries. Staff then filed all approved forms in a secure file cabinet and transferred all forms from the previous year to archives. Archived forms may only be retrieved by authorized ethics personnel and are kept for six (6) years after which time they are destroyed.

Compliance Rates

As of the 9:00 a.m., April 17th deadline, six (6) employees and seven (7) board and commission members had not filed as required under the ethics code.

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A detailed list of individuals not in compliance may be found at the end of this report.

Penalties

Affected employees who fail to comply with the requirement of K.C.C. 3.04.050 are in violation of the King County Code of Ethics and subject to penalties provided in K.C.C. 3.04.060, including disciplinary action, up to and including termination from employment. Under the same code provision, members of boards and commissions who fail to comply with this requirement shall be subject to immediate removal from such appointments by their appointing authority. Outstanding disclosure statements may be filed at any time with the ethics office.

Board of Ethics Action

Under the penalties provision detailed above, the Board of Ethics will immediately issue a show cause letter to those who have not yet filed asking the individual to file the required

statement or provide the county with written justification as to why they do not have to comply with the disclosure requirement no later than May 1, 2006.

Recommendations

It is clear that the role of leadership matters in ensuring compliance with the disclosure program. Each year, filing compliance increases when department directors and deputy directors take active involvement. County leaders make a significant impact on compliance when they communicate the program's importance and their expectation of full cooperation.

Filing by board and commission members also has achieved a high compliance rate. However, it is recommended that directors continue to communicate with these citizen volunteers throughout the disclosure period to ensure that members understand the importance of the filing requirement and that they comply with the law.

Timely filing results not only in the desired legal compliance, but also in program efficiencies and cost savings to the county.

Appreciation

On behalf of the Board of Ethics, executive director and staff, we thank county leaders and the employees designated to coordinate the program within their departments. We seek improvements in the program each year and welcome your comments.